

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO**

In re:)	CASE NO. 14-61086
)	
E.D.C. LIQUIDATING, INC.)	CHAPTER 11
)	
Debtors,)	ADVERSARY PROCEEDING
_____)	NO. 15-6060
)	
JOHN PIDCOCK, Not Individually, but Solely)	
As Trustee for the E.D.C. Liquidating Trust)	
)	JUDGE RUSS KENDIG
Plaintiff,)	
)	
v.)	
)	
MO-TECH CORP.)	
)	
Defendant.)	

MOTION FOR SUMMARY JUDGMENT

Pursuant to Rule 7056 of the Federal Rules of Bankruptcy Procedure, defendant Mo-Tech Corp. ("Mo-Tech") hereby moves the Court to enter an order granting it summary judgment in this matter. The grounds for the motion are set forth in the attached memorandum. And, this Motion is supported by the attached memorandum, and the affidavit of Thomas Nielsen, the president of Mo-Tech which is attached to the memorandum.

WHEREFORE, Mo-Tech respectfully moves this Court for an order granting it summary Judgment pursuant to Rule 56 of the Federal Rules of Civil Procedure and Rule 7056 of the Federal Rules of Bankruptcy Procedure, and for whatever other relief that the Court deems just and equitable.

Dated: November 18, 2016

Respectfully submitted,

/s/ Robert M. Stefancin
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*Attorneys for Defendant,
Mo-Tech, Corp.*

CERTIFICATE OF SERVICE

I certify that on November 18, 2016, a true and correct copy of the Motion for Summary

Judgement was served:

Via the Court's Electronic Case Filing System on these entities and individuals who are listed on the Court's Electronic Mail Notice List:

- Brian J. Jackiw brianj@restructuringshop.com, brianj@ecf.courtdrive.com
- United States Trustee (Registered address)@usdoj.gov

And by regular U.S. mail, postage prepaid, on:

- No manual recipients

Dated: November 18, 2016

/s/ Robert M. Stefancin
Robert M. Stefancin